IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

PROMESA Title III

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

Case No. 17 BK 3283-LTS

as representative of

(Jointly Administered)

Debtors.¹

THE COMMONWEALTH OF PUERTO RICO et al.,

INFORMATIVE MOTION OF ASSURED GUARANTY CORP. AND ASSURED GUARANTY MUNICIPAL CORP. REGARDING THE JUNE 28, 2019 HEARING

To the Honorable United States Magistrate Judge Judith Gail Dein:

Assured Guaranty Corp. and Assured Guaranty Municipal Corp. (together, "Assured") hereby submit this informative motion in compliance with the *Hearing Procedures Order for June 28, 2019 Hearing* (ECF No. 7524)², and respectfully state as follows:

William J. Natbony, Casey Servais, and Thomas Curtin of Cadwalader,
 Wickersham & Taft LLP will appear on behalf of Assured at the June 28, 2019 hearing in

The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² "ECF No." refers to documents filed in Case No. 17-BK-3283-LTS, unless otherwise noted.

Courtroom 17C of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007.

- 2. Mr. Natbony will present oral argument, on behalf of Assured, (i) in opposition to the Motion of (I) Financial Oversight and Management Board, Acting Through Its Special Claims Committee, and (II) Official Committee of Unsecured Creditors, Under Bankruptcy Code Sections 105(a) and 502 and Bankruptcy Rule 3007, to (A) Extend Deadlines and (B) Establish Revised Procedures with Respect to Omnibus Objections to Claims by Holder of Certain Commonwealth General Obligation Bonds Issued in 2011, 2012 and 2014, and for Related Relief (ECF No. 7137), and (ii) on all other related papers.
- 3. Mr. Natbony will present oral argument, on behalf of Assured, (i) in opposition to the *Urgent Motion of Official Committee of Unsecured Creditors for Order, Pursuant to Bankruptcy Code Section 926(a), Authorizing Committee to Pursue Certain Avoidance Actions on Behalf of Puerto Rico Electric Power Authority* (ECF No. 7484), and (ii) on all other related papers.
- 4. Mr. Natbony, Mr. Servais, and Mr. Curtin reserve the right to be heard on any matter raised by any party at the hearing as concerns Assured related to the Title III cases, or any adversary proceeding pending in the Title III Cases, or the interests of Assured.

Dated: June 25, 2019

New York, New York

CASELLAS ALCOVER & BURGOS P.S.C.

CADWALADER, WICKERSHAM & TAFT LLP

By: <u>/s/ Heriberto Burgos Pérez</u>

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By: /s/ Howard R. Hawkins, Jr.

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Counsel for Assured Guaranty Corp. and Assured Guaranty Municipal Corp.

^{*} Admitted pro hac vice

CERTIFICATE OF SERVICE

I hereby certify that I filed this document electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties of record in the captioned case.

At New York, New York, 25th day of June 2019.

By: /s/ Howard R. Hawkins, Jr.

Howard R. Hawkins, Jr.*

* Admitted pro hac vice